

**THE ROSEN LAW FIRM, P.A.**

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*[Proposed] Lead Counsel for Plaintiff and the Class*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

SCOTT STERLING, Individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

IRIS ENERGY LIMITED, DANIEL  
ROBERTS, WILLIAM ROBERTS,  
BELINDA NUCIFORA, DAVID  
BARTHOLOMEW, CHRISTOPHER  
GUZOWSKI, and MICHAEL ALFRED,

Defendants.

No.: 2:22-cv-07273-JMV-MAH

**NOTICE OF MOTION OF MARY-  
JANE OWEN TO APPOINT LEAD  
PLAINTIFF AND APPROVE  
LEAD PLAINTIFF'S  
SELECTION OF COUNSEL**

CLASS ACTION

**Motion Date: March 20, 2023**

**PLEASE TAKE NOTICE** that pursuant to Section 27 of the Securities Act of 1933, 15 U.S.C. § 77z-1(3)(B) and Section 21D of the Securities and Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), plaintiff Mary-Jane Owen (“Movant”) hereby moves the Honorable John Michael Vazquez, United States District Judge, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Courtroom PO 03, Newark, NJ, 07101, for an order appointing Movant to serve as Lead Plaintiff in this action and approving her selection of The Rosen Law Firm, P.A. as Lead Counsel for the litigation and all subsequently filed related litigations.

In support of this Motion, Movant submits: (1) the Declaration of Laurence M. Rosen, dated February 13, 2023 (with exhibits); (2) a Memorandum of Law in support of Motion, dated February 13, 2023; and (3) a [Proposed] Order.

Dated: February 13, 2023

Respectfully submitted,

**THE ROSEN LAW FIRM, P.A.**

/s/ Laurence M. Rosen  
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*[Proposed] Lead Counsel for Plaintiff and  
the Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 13, 2023, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Laurence M. Rosen